REMARKS

Status of the Claims

Claims 21-50 are now pending in the application, new Claims 41-50 having been added in the present amendment, and original Claims 1-20 have previously been cancelled. Claims 21, 30, and 36 have been amended to more clearly define the present invention.

Claims Rejected under 35 U.S.C. § 102(b)

The Examiner has rejected Claims 21-25 and 30-40 as being anticipated by Doyle (U.S. Patent No. 5,838,906). The Examiner asserts that Doyle describes each element of applicants' claimed invention. Applicants respectfully disagree with the rejection for the reasons explained below.

In the interest of reducing the complexity of the issues for the Examiner to consider in this response, the following discussion focuses on amended independent Claims 21, 30, and 36. The patentability of each remaining dependent claim is not addressed in detail; however, applicants' decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that such dependent claims are not patentable over the cited references. Similarly, applicants' decision not to discuss differences between the prior art and every claim element, or every comment made by the Examiner, should not be considered as an admission that applicants concur with the Examiner's interpretation and assertions regarding those claims. Indeed, applicants believe that all of the dependent claims patentably distinguish over the references cited. However, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

With regard to amended independent Claim 21, applicants have clarified the recited method for accessing multiple types of electronic content to more clearly distinguish over Doyle's method. Significant differences exist between the invention defined by Claim 21 and Doyle's disclosure, with regard to at least one unique data structure utilized in applicants' claimed invention (i.e., the service container).

In applicants' claimed method, the service container enables a client program module to access multiple types of content without the client program module having any knowledge of what type of content it is accessing (see applicants' specification, page 2, lines 16-19). A service manager connects the client program module to the appropriate service container to process the input to achieve the desired output (see applicants' specification, page 11, lines 15-20). The service container can contain code objects, associated data objects and a loader ID. *Id.* The service container code object refers to

MS 146858.01
MICR0512-1-1\0512AM 05-24-2004.doc

1   one or more service objects (i.e., programming segments) that perform specific functions required to
2   process the input (see applicants' specification, page 11, lines 20-21). An exemplary application of the
3   present invention might occur when a word processor user (the client program module) requires a
4   foreign translation for the word "loves." The word processor receives a request to process an input to
5   obtain an output comprising a type of content (the French translation for the word "loves"), but this
6   translation functionality is unknown to the word processor. Then the service manager provides access
7   to a French translation dictionary service container that includes the service objects, a stemmer, and a
8   look-up object (see applicants' specification, page 14, lines 10-15). These service objects are utilized to
9   truncate the suffix "s" from the base word "love" and are then used to look up the word "love" in the
10 French dictionary to provide the output (see applicants' specification, page 14, lines 10-25). As shown
11 by this example, the segments of computer code are executed only to provide support for the word
12 processor when the foreign language translation was requested.

13 In contrast with applicants' claimed invention, in Doyle's method, a unique and custom data
14 structure (i.e., a data structure equivalent to a service container) is not created. Instead, when the
15 browser client parses the hypermedia document in Doyle, it detects links to data objects that were
16 embedded when the hypermedia document was created (Doyle, column 9, lines 24-31) and invokes the
17 application client. Doyle accesses the XEvent interprocess communication protocol to exchange
18 information between the browser client and application client (Doyle, column 9, lines 7-10), as the
19 Examiner points out in his Office Action of September 10, 2003 (page 5). Thus, Doyle does not teach
20 or suggest the data structure recited in Claim 21 that includes the service container or its equivalent.

21 With regard to amended independent Claim 30, applicants have clarified the recited computer
22 system for accessing multiple types of electronic content to more clearly distinguish over Doyle for
23 reasons similar to those discussed above in connection with Claim 21. Thus, Claim 30 is patentably
24 distinguishable over the cited reference for substantially the same reasons as discussed above.
25 Similarly, Claim 36 has been amended to recited a service container, and thus, is also distinguishable
26 over Doyle for substantially the same reasons as discussed above, regarding Claim 21. Because
27 dependent claims are considered to include each element of the independent claims from which they
28 depend, each claim respectively ultimately depending on independent Claims 21, 30 and 36 must be
29 patentable for at least the same reasons as the independent claims. Accordingly, the rejection of
30 independent Claims 21-25 and 30-40 under 35 U.S.C. § 102(b) over Doyle should be withdrawn.

MS 146858.01
MICR0512-1-1\0512AM 05-24-2004.doc

Claims Rejected under 35 U.S.C. § 103(a)

1
2   Claims 26-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Doyle in view

3 of Tolin et al. (U.S. Patent No. 5,490,061 hereinafter "Tolin"), which discloses computer based

4 translations services. The Examiner asserts that it would have been obvious to one of ordinary skill

5 in the art at the time the invention was made to modify the method disclosed by Doyle in include a

6 computer translation service, as disclosed by Tolin, to enable such translation to be achieved.

7 However, Tolin does not teach or suggest the data structure (i.e. the service container) recited by

8 applicants in independent Claim 21, thus the suggested combination of Tolin and Doyle fails to

9 achieve an invention equivalent to the invention defined by applicants in Claim 21. Because

10 dependent claims are considered to include each element of the independent claim from which they

11 depend, Claims 26-29 are similarly distinguishable over the suggested combination of Tolin and

12 Doyle. Accordingly, the rejection of dependent Claims 26-29 under 35 U.S.C. § 103(a) over Doyle

13 in view of Tolin should be withdrawn.

Patentability of Newly Added Claims

14
15   Applicants have added new Claims 41-50, which are fully supported and enabled in the

16 specification. These claims do not raise any new issues that would require a further search. The added

17 claims provide additional details relating to applicants' service container data structure. Such detail is

18 clearly described in the application as filed (in particular see the text in the specification corresponding

19 to FIGURES 2 and 3). It should also be noted that elements relating to service containers were

20 originally introduced in Claims 1-20 as filed with the application, albeit using different language and in

21 different combinations. Unfortunately, the original claims did not appear to clearly illustrate how the

22 service container data structure is organized, even though the core elements of the service container

23 were recited. Because the elements of the service container were included in the original claims, it

24 would appear a search relating to such elements has already been made. Applicants believe that the

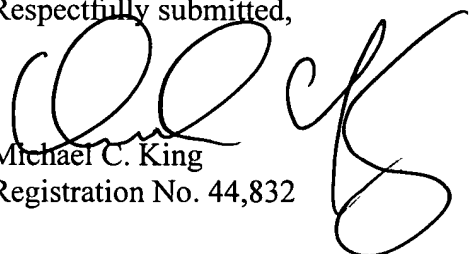25 service container data structure distinguishes over the cited art for the following reasons.

26   Each service container corresponds to a specific function or utility to be made available to a

27 computer program, but which the computer program is itself unaware and incapable of performing. For

28 example, the specification as filed clearly discloses a French dictionary service container, a German

29 dictionary service container, and a Hebrew dictionary service container that are made available to a word

30 processing program. Each service container includes a data object, an identification (ID) loader, and a

-11-

code object. The data object includes the data required to support the function, i.e. a French, German, or Hebrew dictionary. The code object initially includes references (or links) to one or more segments of programming code required to support the functionality of the service container. In the case of a translation dictionary, a stemmer function, a look-up function, and conversion function (XML to RTF) may be useful (such programming segments and their utility are clearly disclosed in the specification as filed, particularly in conjunction with the description of FIGURE 3). The actual segments of code are stored in a separate data structure, such as a cache, as many different service containers may call to the same code segments. The code segments are referred to as service objects. The ID loader is an interface that enables the program to determine how to load a given service object. The cited art does not teach or suggest any data structure equivalent to applicants' service container.

Claims 41-43 depend on Claim 21, and recite additional detail relating to the service container. Claims 44-46 depend on Claim 30, and recite additional detail relating to the service container. Similarly, Claims 47-49 depend on Claim 36, and also recite additional detail relating to the service container. Claim 50 is a new independent claim, generally based on Claim 21, but rewritten to indicate how the service container is employed.

In view of the amendments and Remarks set forth above, it will be apparent that the claims in this application define a novel and non-obvious invention, and that the application is in condition for allowance and should be passed to issue without further delay. Should any further questions remain, the Examiner is invited to telephone applicants' attorney at the number listed below.

Respectfully submitted,

Michael C. King
Registration No. 44,832

MCK/RMA/SKM:lrg:klp

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid addressed to: Commissioner for Patents, Alexandria, VA 22313-1450, on May 24, 2004.

Date: May 24, 2004

-12-

LAW OFFICES OF RONALD M. ANDERSON
600 - 108th Avenue N.E., Suite 507
Bellevue, Washington 98004
Telephone: (425) 688-8816   Fax: (425) 646-6314

MS 146858.01
MICR0512-1-1\0512AM 05-24-2004.doc